

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF EDUCATION, *et al.*,

Defendants.

Case No. 1:25-cv-02990 (ER)(BCM)

[PROPOSED] PRELIMINARY INJUNCTION ORDER

The Court, upon reviewing the parties' filings, including (i) Plaintiffs' Complaint (ECF No. 1), (ii) Plaintiffs' Memorandum of Law in Support of Motion for Immediate Injunctive Relief, dated May 14, 2025 (ECF No. __); (iii) the declaration in support of Plaintiffs' motion (ECF No. __); (iv) Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion for Immediate Injunctive Relief (ECF No. __); (v) Plaintiffs' Reply Memorandum of Law in Further Support of Motion for Immediate Injunctive Relief (ECF No. __); all papers submitted on Plaintiffs' April 11, 2025, motion for a preliminary injunction (ECF Nos. 10–28, 63, 67–69); and all other papers and orders herein; and having heard all counsel, it is hereby ordered as follows:

ORDERED that, sufficient reason having been shown therefor:

1. The Defendants are preliminarily enjoined from enforcing or implementing as against Plaintiffs during the pendency of this litigation or until further order of the Court the directives in the May 11, 2025 "Dear Colleague" letter from Hayley B. Sanon (ECF No. __) ("Letter"), which purported to terminate the periods of time for Plaintiffs to liquidate their

obligations under the Education Stabilization Fund, as that term is defined in the Letter, as of May 24, 2025.

2. The Defendants are hereby directed to process Plaintiffs' outstanding and future requests for liquidation of Education Stabilization Funds without delay, and within one week from the issuance of this Order shall file with the Court a status report listing for each Plaintiff the payment requests for liquidation of Education Stabilization Funds that are then outstanding, including the amount of each request, the date each request was submitted, and the anticipated date by which each request will be processed.

3. The Defendants must provide written notice of this Order to all personnel within the U.S. Department of Education. The written notice shall instruct all personnel that they must comply with the provisions of this Order. Defendants shall confirm in the status report filed in accordance with paragraph 2 of this Order that all personnel within the U.S. Department of Education have received this notice.

By the Court:

Dated

United States District Judge